

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Juan Jose Sanchez-Alvarado

COB: Mexico

DOB: 1985

Case No.

M-20-0337-M

Defendant(s)

SEALED

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 12, 2018-July 24, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2251(a)

Production of Child Pornography

18 U.S.C. § 2422(b)

Enticement of a Minor

This criminal complaint is based on these facts:

SEE ATTACHMENT A

☒ Continued on the attached sheet.

Approved AUSA Mike Moll
 2/7/20

/s/ Andrew Bonneau

Complainant's signature

Andrew Bonneau, HSI Special Agent

Printed name and title

Sworn to and executed by reliable electronic means, sworn to
 and attested telephonically per FED.R.CR.4.1, and probable
 cause found on:

Date: 02/07/20208:40 am

City and state:

McAllen, TX

Peter E Ormsby
 Judge's signature

U.S. Magistrate Judge Peter Ormsby

Printed name and title

On July 24, 2018, members of the Homeland Security Investigations (HSI) led Rio Grande Valley Child Exploitation Investigation Task Force (RGV CEITF) opened an investigation regarding an investigative referral generated by the National Center for Missing and Exploited Children (NCMEC) for the Kyle, Texas Police Department (KPD). While working a separate NCMEC case, the RGV CEITF identified the minor child of the NCMEC case assigned to KPD. The KPD referral was from Facebook, Inc.

Facebook Inc. provided NCMEC with the following Facebook accounts: User Identification (UID) 100023236181251 (hereinafter UID 1). UID 1's Facebook account had a listed name of "Katie Banks," with an email identified as mistresskbanks8701@yahoo.com, and a date of birth of 04/20/1987, and UID 100021142746328 (hereinafter UID 2). The listed name on UID 2 is "Juan Sanchez," the email is juan_san022585@outlook.com. UID 1 and UID 2 were linked to Juan Jose SANCHEZ-ALVARADO in San Marcos, Texas.

SANCHEZ-ALVARADO was suspected of using likeness of "Katie Banks" via Facebook, to exploit children to produce images and videos which constitute the federal definition of child pornography under Title 18, United States Code, Section 2256(8). Katie Banks is a known adult film actress.

The conduct occurred from on, or about, January 12, 2018 to on, or about, July 24, 2018. Through the course of the investigation and after executing a search warrant for Facebook account information on Facebook accounts UID 1 and UID 2, approximately twenty-two (22) victims have been identified as being exploited to produce image and video files, which constitute child pornography. All of the identified victims lived in the Rio Grande Valley in the Southern District of Texas during the production of the child pornography. The ages of the victims identified ranged from 14 to 17 of age at the time of victimization.

Approximately eight (8) of the victims have been forensically interviewed. The victims confirmed they had contact via Facebook with UID 1 "Katie Banks". The victims confirmed the conversation was sexual in nature. The victims also confirmed they received nude images of "Katie Banks" from UID 1 and were asked to produce child pornography images and videos. The victims confirmed they sent the requested images and videos to UID 1 via Facebook.

On February 04, 2020, Special Agent (SA) Andrew Bonneau and SA Troy Guthrie interviewed Juan Jose SANCHEZ-ALVARADO. SANCHEZ-ALVARADO agreed to be transported to the San Marcos Police Department for the interview. SANCHEZ-ALVARADO was read his Miranda Rights in the English language. SANCHEZ-ALVARADO confirmed he could read, write, speak, and understood English. SANCHEZ-ALVARADO waived his Miranda Rights and agreed to answer all questions.

During the Interview SANCHEZ-ALVARADO admitted to creating Facebook account UID 1, with the listed name of "Katie Banks". SANCHEZ-ALVARADO admitted he used the Facebook account to entice multiple minors to produce images of their exposed genitalia and videos of them masturbating. SANCHEZ-ALVARADO also admitted he knew the ages of some of the minors and would entice the minors to produce child pornography images and videos.